

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BREX INC.,

Plaintiff,

v.

RYAN MACK,

Defendant.

CIVIL ACTION
NO.: 1:24-cv-04192-JLR

STIPULATED TEMPORARY RESTRAINING ORDER

Without Defendant admitting to any of the allegations contained in Plaintiff's Complaint the Court now enters the following orders by agreement of the parties:

1. Until further order of this Court, Defendant Ryan Mack is enjoined from accessing, using and/or disclosing in any way any confidential information and/or trade secrets belonging to, or arising from his employment with, Brex Inc. Defendant shall also preserve and maintain all information in any format and in any location that is relevant to Plaintiff's claims in this lawsuit throughout the pendency of this proceeding and shall hereafter neither undertake nor permit any activity at any time during the remainder of this proceeding that will cause deletion and/or destruction of information, documents, and any other evidence that is potentially relevant to this lawsuit.

2. Defendant is enjoined from directly or through others soliciting, inducing, encouraging, or actively participating in the solicitation, inducement, or encouragement of any person known to me to be Plaintiff's employee, consultant, or independent contractor to terminate his or her relationship with Plaintiff, including by assisting in the recruitment, interviewing, or onboarding of any such individual by Ramp.

3. Within 7 days of the entry of this Order, the Parties shall retain a neutral forensic examiner to conduct a forensic review of all items in Defendant's Disclosure List, as defined in the forensic protocol agreed to by the parties, and such other devices or accounts as the parties agree to review pursuant to the Protocol, with such forensic review resulting in a return to Plaintiff of its confidential information and/or trade secrets, if any, that are located on such devices or accounts and a remediation of such information from Defendant's possession, custody, and control. The Parties have negotiated a Stipulated Forensic Protocol that will govern and outline the forensic review contemplated in this paragraph. The results of the forensic examination shall be made available to the parties and their forensic examiners subject to the terms of the protocol.

4. The costs to retain the independent third party to conduct the forensic review shall be borne by Plaintiff. Plaintiff will not be prevented from seeking reimbursement at later stages of the proceeding for amounts incurred as a result of the forensic review, if applicable law so permits.

5. Defendant's time to respond to Plaintiff's Complaint is extended to August 26, 2024.

6. This Order will remain in effect through the date of the parties' Initial Pretrial Conference on August 27, 2024.

THE FOREGOING IS HEREBY STIPULATED AND AGREED TO BY THE PARTIES.

BREX INC.

RYAN MACK

By: /s/ Miguel A. Lopez

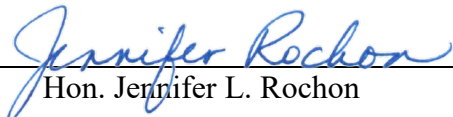
By: /s/ Michael H. Reed

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IT IS SO ORDERED.

Dated: June 14, 2023
New York, New York


Hon. Jennifer L. Rochon